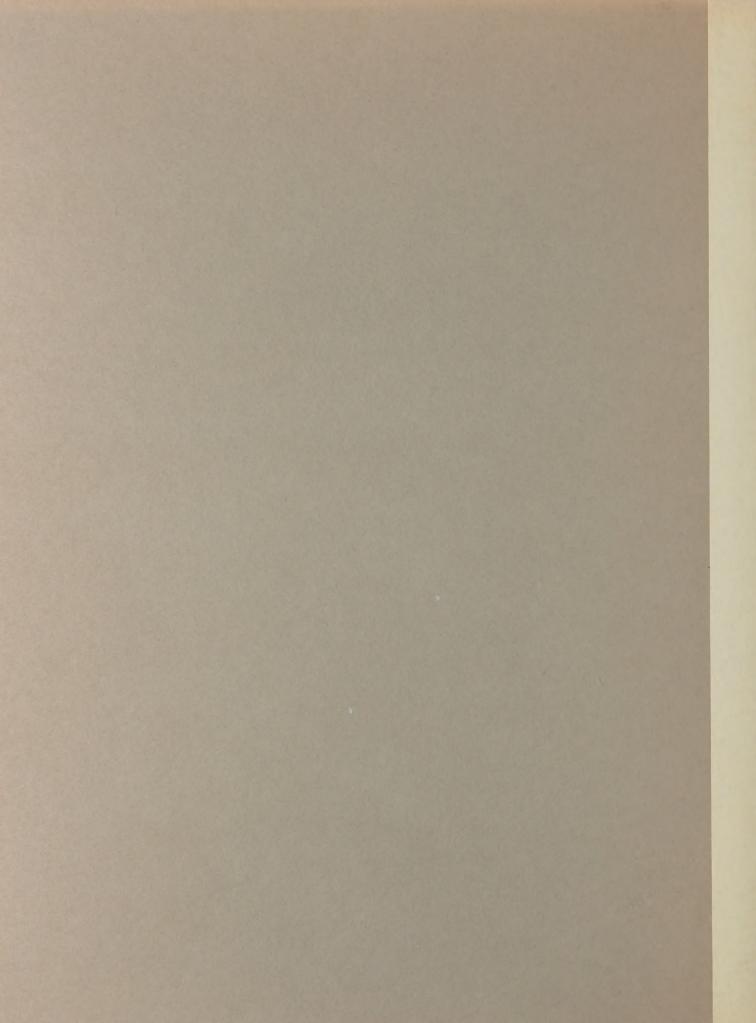
SUBMISSION BY

FREDERICK G. GARDINER, Q.C.

TO

THE COMMISSION APPOINTED BY THE LIEUTENANT - GOVERNOR - IN - COUNCIL OF THE PROVINCE OF ONTARIO TO INQUIRE INTO THE AFFAIRS OF THE MUNICIPALITY OF METROPOLITAN TORONTO

JUNE 15th, 1957



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TO THE CHAIRMAN AND MEMBERS OF THE COMMISSION
APPOINTED BY THE LIEUTENANT-GOVERNOR-IN-COUNCIL
OF THE PROVINCE OF ONTARIO TO INQUIRE INTO THE
AFFAIRS OF THE MUNICIPALITY OF METROPOLITAN TORONTO

THE SUBMISSIONS CONTAINED IN THIS MEMORANDUM

ARE THE PERSONAL VIEWS OF THE WRITER AND NOT

NECESSARILY THOSE OF THE MEMBERS OF THE METROPOLITAN

COUNCIL.

THE SUBMISSIONS CONTAINED HEREIN ARE RELATED

TO THREE QUESTIONS:

- 1. IS THE METROPOLITAN COUNCIL AS PRESENTLY

 CONSTITUTED CALCULATED TO GIVE ADEQUATE REPRE
 SENTATION BY POPULATION TO THE THIRTEEN CONSTITUENT

 MUNICIPALITIES AND IF NOT IN WHAT MANNER MAY A MORE

 SATISFACTORY RESULT BE ACCOMPLISHED?
- 2. WHAT WOULD CONSTITUTE REASONABLY ADEQUATE

 COMPENSATION TO THE MEMBERS OF THE METROPOLITAN

 COUNCIL?

- 3. SHOULD THE CHAIRMAN OF THE COUNCIL
 - (A) BE ELECTED AT LARGE BY THOSE ENTITLED TO

 VOTE IN THE METROPOLITAN AREA?
 - (B) BE ONE OF THE MEMBERS OF THE COUNCIL

 ELECTED IN A LOCAL MUNICIPALITY?

OR

(C) IS THE PRESENT SYSTEM OF AN ANNUAL ELECTION

OF A CHAIRMAN WHO MAY OR MAY NOT BE AN

ELECTED MEMBER OF THE COUNCIL SATISFACTORY?

I SHALL MAKE MY SUBMISSIONS WITH RESPECT TO EACH OF THESE MATTERS SEPARATELY:

(1)

IS THE METROPOLITAN COUNCIL AS PRESENTLY
CONSTITUTED CALCULATED TO GIVE ADEQUATE
REPRESENTATION BY POPULATION TO THE THIRTEEN
CONSTITUENT MUNICIPALITIES AND IF NOT IN WHAT
MANNER MAY A MORE SATISFACTORY RESULT BE
ACCOMPLISHED?

THE METROPOLITAN TORONTO FORM OF GOVERNMENT

AMERICA ACT DEFINES THE POWERS OF THE DOMINION GOVERNMENT AND OF THE PROVINCES, THE MUNICIPALITY OF METROPOLITAN TORONTO ACT DEFINES THE POWERS OF THE MUNICIPALITY OF METROPOLITAN TORONTO AND THE MUNICIPAL
ACT DEFINES THE POWERS OF THE LOCAL MUNICIPALITIES. THE
METROPOLITAN CORPORATION HAS NO GENERAL POWERS.

ITS POWERS ARE THOSE SPECIFICALLY CONFERRED BY THE
SPECIAL ACT OF INCORPORATION AND AMENDMENTS THERETO.

IF IT IS CORRECT TO SAY THAT THE METROPOLITAN

FORM OF GOVERNMENT IS A FEDERAL SYSTEM OF MUNICIPAL

GOVERNMENT, THEN UPON THE QUESTION OF REPRESENTATION

BY POPULATION, IT IS APPROPRIATE TO OBSERVE THAT THERE

IS NO CLOSE APPROXIMATION BETWEEN THE POPULATION IN

THE FEDERAL CONSTITUENCIES EACH OF WHICH IS REPRESENTED

IN THE HOUSE OF COMMONS BY ONE MEMBER, NOR IS THERE ANY

CLOSE APPROXIMATION BETWEEN THE POPULATION IN THE PROVINCIAL RIDINGS, EACH OF WHICH IS REPRESENTED BY ONE MEMBER IN THE ONTARIO LEGISLATURE. IN THE FEDERAL FIELD THE RIDING WITH THE LARGEST POPULATION IS YORK-SCARBOROUGH WITH 170,000 RESIDENTS AND THE SMALLEST RIDING IS ILE DE LA MADELAINE WITH 11,556 RESIDENTS. IN THE PROVINCE OF ONTARIO FIELD THE RIDING CONTAINING THE LARGEST NUMBER OF VOTERS IS YORK-EAST WITH 79, 571 AND THE SMALLEST IS RAINY RIVER WITH 12,350. FROM THESE FIGURES IT IS OBVIOUS THAT ON THE FEDERAL AND PROVINCIAL LEVEL WE ARE NO STRANGERS TO A SYSTEM WHERE THERE IS AN ACCEPTED WIDE DIVERGENCE OF REPRESENTATION BY POPULATION.

THE SITUATION WITH RESPECT TO POPULATION IN

THE THIRTEEN MUNICIPALITIES CONSTITUTING METROPOLITAN

TORONTO ACCORDING TO 1956 FIGURES IS AS FOLLOWS:

CITY OF TORONTO

662, 973

SUBURBAN MUNICIPALITIES

NORTH YORK	169, 382	
SCARBOROUGH	139,069	
YORK	116, 936	
ETOBICOKE	103, 144	
EAST YORK	69, 368	
FOREST HILL	19,364	
LEASIDE	16,458	
MIMICO	13,608	
NEW TORONTO	11, 505	
LONG BRANCH	10,207	
WESTON	9, 455	
SWANSEA	8, 564	687,060
		1, 350, 033

THE TWELVE SUBURBAN MUNICIPALITIES MAY BE
DIVIDED INTO FOUR CATEGORIES WITH APPROXIMATELY

COMPARABLE POPULATIONS.

CATEGORY 1

SWANSEA	8,564
WESTON	9,455
LONG BRANCH	10,207
NEW TORONTO	11,505
MIMICO	13,608

CATEGORY II	
LEASIDE	16,458
FOREST HILL	19, 364
CATEGORY III	
EAST YORK	69, 368
CATEGORY IV	
ETOBICOKE	103, 144
YORK	116, 936
SCARBOROUGH	139,069
NORTH YORK	169,382

IT IS ALSO INTERESTING TO NOTE THAT ON AN
ASSESSMENT BASIS THE SEVERAL SUBURBAN MUNICIPALITIES
FALL INTO THE SAME CATEGORIES AS INDICATED, AS
FOLLOWS:

NAME OF MUNICIPA	ALITY ASSESSMENT
CATEGORY 1	
SWANSEA	\$19, 164, 361
WESTON	19, 781, 146
LONG BRANCH	15, 430, 217
NEW TORONTO	35, 141, 287
MIMICO	22,622,752
CATEGORY II	
LEASIDE	60,868,545
FOREST HILL	58, 190, 984
CATEGORY III	
EAST YORK	104,659,106

CATEGORY IV

 ETOBICOKE
 208, 130, 429

 YORK
 186, 037, 242

 SCARBOROUGH
 251, 489, 768

 NORTH YORK
 371, 808, 995

IT IS MY VIEW THAT THE CITY OF TORONTO MUST HAVE AN EQUAL NUMBER OF REPRESENTATIVES AND AN EQUAL VOTING STRENGTH TO THE COMBINED TOTAL REPRESENTED BY THE SUBURBAN MEMBERS. THIS SUB-MISSION IS FOUNDED UPON THE FACT THAT THE POPULATION IN THE CITY OF TORONTO IS RELATIVELY EQUAL TO THE TOTAL POPULATION OF THE TWELVE SUBURBS AND THAT THE TOTAL ASSESSMENT IN TORONTO IS APPROXIMATELY 54% OF THE TOTAL IN THE AREA WITH THE EXCELLENT TAX BASE OF APPROXIMATELY 61% INDUSTRIAL AND COM-MERCIAL COMPARED TO 39% RESIDENTIAL.

ACCEPTING THE PREMISE THAT THE CITY OF

TORONTO IS ENTITLED TO AN EQUALITY OF REPRESENTATION

AND VOTING STRENGTH COMPARED TO THE TOTAL OF THE

SUBURBS THERE ARE TWO WAYS IN WHICH A MORE REASONABLE
REPRESENTATION BY POPULATION CAN BE ESTABLISHED THAN
THAT WHICH PRESENTLY PREVAILS:

- 1. THE ESTABLISHMENT OF A NUMBER OF METROPOLITAN

 DISTRICTS FROM EACH OF WHICH A MEMBER WILL BE

 ELECTED DIRECTLY TO THE METROPOLITAN COUNCIL

 WITH ONE VOTE:
- 2. THE CONTINUATION OF THE PRESENT SYSTEM OF

 CONSTITUTING THE METROPOLITAN COUNCIL BUT

 WITH THE PROVISION OF A MULTIPLE-VOTING SYSTEM

 SO THAT UPON IMPORTANT QUESTIONS THERE WILL

 BE REPRESENTATION BY POPULATION.

 I WILL COMMENT UPON EACH OF THESE SEPARATELY:
- 1. THE ESTABLISHMENT OF A NUMBER OF THE METRO-POLITAN DISTRICTS FROM EACH OF WHICH A MEMBER WILL BE ELECTED TO THE METROPOLITAN COUNCIL WITH EACH MEMBER HAVING ONE VOTE.

THIS SYSTEM SOUNDS SIMPLE AND PRACTICAL BUT IT

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IS SUBJECT TO A VERY SERIOUS DEFECT. THE DEFECT IS

THAT THE LIAISON BETWEEN THE LOCAL COUNCILS AND THE

METROPOLITAN COUNCIL IS LOST. THIS IN MY VIEW IS

SUFFICIENTLY SERIOUS TO CONDEMN SUCH AN ARRANGEMENT.

A MAP IS ATTACHED INDICATING HOW EIGHTEEN

METROPOLITAN DISTRICTS MIGHT BE ESTABLISHED EACH WITH

A REASONABLY COMPARABLE POPULATION.

THE ATTACHED MAP INDICATES THAT THE CITY OF
.
TORONTO HAS NINE WARDS, THE POPULATION OF WHICH IS AS
FOLLOWS:

WARD	3	33,000
WARD	7	54,000
WARD	2	63,000
WARD	4 .	65,000
WARD	9	71,000
WARD	1	73,000
WARD	8	85,000
WARD	5	95,000
WARD	6	124,000

WHILE IT MAY BE SAID THAT SUCH A VARIATION IN POPULATION
IS SUBSTANTIAL IT IS TO BE NOTED THAT WARD 3 CONSTITUTES
A SPECIAL SITUATION AS IT CONTAINS THE BUSINESS,

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FINANCIAL AND INSTITUTIONAL AREA WHERE THE RESIDENT POPULATION IS SMALL BUT THE BUSINESS POPULATION AND ASSESSMENT IS VERY LARGE.

IF A SYSTEM OF METROPOLITAN DISTRICTS WERE ESTABLISHED THE PRESENT NINE WARDS IN THE CITY SHOULD NOT BE DISTURBED AS THEY HAVE BEEN LONG ESTABLISHED AND ARE WELL KNOWN. THE NINE CITY WARDS COULD BECOME METROPOLITAN DISTRICTS 1 TO 9. IF SUCH A COURSE WERE FOLLOWED THEN THERE SHOULD BE NINE SUBURBAN DISTRICTS WHICH WOULD REQUIRE THE SUBDIVISION OF SOME SUBURBS AND THE COMBINATION OF OTHERS. AS IS INDICATED IN THE MAP THE FOLLOWING IS SUGGESTED AS BEING A REASONABLE DISTRIBUTION BOTH AS TO GEOGRAPHY AND POPULATION OF THE NINE METROPOLITAN DISTRICTS IN THE SUBURBS:

METROPOLITAN DISTRICTS

NO., 10 SCARBOROUGH-SOUTH 76,000

NO. 11 SCARBOROUGH-NORTH 63,000

METROPOLITAN DISTRICTS (Continued)

NO. 12	EAST YORK AND LEASIDE	86,000
NO. 13	NORTH YORK-EAST	91,000
NO. 14	NORTH YORK-WEST	78,000
NO. 15	YORK EAST AND FOREST HILL	98,000
NO. 16	YORK WEST AND SWANSEA	57,000
NO. 17	MIMICO, NEW TORONTO, LONG BRANCH AND SOUTH OF QUEEN ELIZABETH HIGHWAY IN ETOBICOKE	54,000
NO. 18	ETOBICOKE NORTH OF QUEEN ELIZABETH HIGHWAY	84,000

SUCH AN ARRANGEMENT WOULD RESULT IN A COUNCIL

OF EIGHTEEN MEMBERS WITH EQUAL VOTING POWER DIS
TRIBUTED BETWEEN THE CITY AND THE SUBURBS.

IF SUCH A SYSTEM WERE ESTABLISHED IT MIGHT BE

ACCEPTED AS A PRACTICAL SOLUTION TO THE PROBLEM OF

REPRESENTATION BY POPULATION BUT, AS HAS BEEN INDI
CATED, IT HAS THE FATAL DEFECT THAT THE METROPOLITAN

COUNCIL WOULD BE DIVORCED FROM THE LOCAL AREA

MUNICIPALITIES AND LIAISON BETWEEN THE LOCAL COUNCILS

AND THE METROPOLITAN COUNCIL WOULD BE LOST. I CAN

CONCEIVE UNLIMITED TROUBLE IF SOME MUNICIPALITIES

ARE DIVIDED AND OTHERS ARE COMBINED PLUS THE ADDED

DIFFICULTY THAT REPRESENTATIVES ON THE METROPOLITAN

COUNCIL MIGHT HAVE DIFFERENT VIEWS FROM THOSE OF THE

LOCAL COUNCILS. MY RECOMMENDATION IS STRONGLY

OPPOSED TO SUCH A SYSTEM FOR THE REASON INDICATED.

II. TO PERPETUATE THE PRESENT SYSTEM OF CONSTITUTING THE METROPOLITAN COUNCIL BUT ESTABLISHING A MULTIPLE SYSTEM OF VOTING SO THAT UPON IMPORTANT QUESTIONS THERE WILL BE REPRESENTATION BY POPULATION.

AS AN ALTERNATIVE TO THE ESTABLISHMENT OF

METROPOLITAN DISTRICTS A VERY SATISFACTORY ALTER
NATIVE WOULD BE TO PROVIDE FOR A MULTIPLE SYSTEM

OF VOTING IN THE COUNCIL AS PRESENTLY ESTABLISHED.

THIS SYSTEM IS ALREADY IN OPERATION IN COUNTY COUNCILS

WHERE MULTIPLE VOTES ARE ACCORDED ON THE BASIS OF

POPULATION AND THE MULTIPLE VOTING SYSTEM APPLIES

WHEN A RECORDED VOTE IS CALLED ON IMPORTANT QUESTIONS.

ALMOST 100% OF THE BUSINESS OF THE METRO-

POLITAN COUNCIL IS CONDUCTED UPON THE BASIS OF

"VOICE VOTES" AND IT IS ONLY OCCASIONALLY THAT THE

"YEAS AND NAYS" ARE RECORDED WHEN DEMANDED UPON

SOME IMPORTANT QUESTION.

IN ORDER THAT THE VOTING STRENGTH MAY

REASONABLY COMPLY WITH REPRESENTATION BY POPU
LATION THE FOLLOWING ALLOCATION OF VOTES IS

SUGGESTED:

CITY OF TORONTO Mayor 1 4 2 Controllers 2 2 x 3 6 9 Aldermen 9 12 9 x 2 18	28
2 Controllers 2 2 x 3 6	28
	28
9 Aldermen 9 12 9 x 2 18	28
	20
NORTH YORK 1 4	
SCARBOROUGH 1 4	
YORK 1 4	
ETOBICOKE 1 4	
EAST YORK 1 3	
FOREST HILL 1 2	
LEASIDE 1 2	
MIMICO 1	
NEW TORONTO 1 1	
LONG BRANCH 1 1	
WESTON 1 1	
SWANSEA <u>1 12</u> <u>1</u>	28
<u>24</u>	56

THE DISTRIBUTION OF VOTING STRENGTH ON THE

BASIS INDICATED GIVES ONE VOTE TO THE SMALL SUBURBAN

MUNICIPALITIES IN CATEGORY I; TWO VOTES TO THOSE IN

CATEGORY II; THREE VOTES TO THE ONE MUNICIPALITY IN

CATEGORY III; AND FOUR VOTES TO THE LARGE MUNICIPALITIES IN CATEGORY IV.

UNDER THE SUGGESTED SYSTEM PROVISION IS MADE

FOR TWENTY-EIGHT VOTES FOR THE SUBURBS AND TWENTY
EIGHT VOTES FOR THE CITY. THIS CREATES PROVISION FOR

A TOTAL OF FIFTY-SIX VOTES WHEN A RECORDED VOTE IS

CALLED WITH A CASTING VOTE BY THE CHAIRMAN IN THE

EVENT OF AN EQUALITY OF VOTES.

IT IS SUGGESTED THAT THE MULTIPLE SYSTEM

SHOULD NOT APPLY IN COMMITTEE INCLUDING THE COM
MITTEE OF THE WHOLE BUT SHOULD ONLY APPLY WHEN A

RECORDED VOTE IS DEMANDED IN COUNCIL.

THE SYSTEM RECOMMENDED MAINTAINS THE

AUTOMATIC LIAISON BETWEEN THE LOCAL COUNCILS AND

THE METROPOLITAN COUNCIL WHICH IN MY VIEW IS

ESSENTIAL AND AT THE SAME TIME PROVIDES REPRESENTATION BY POPULATION ON IMPORTANT QUESTIONS.

(2)

WHAT WOULD CONSTITUTE REASONABLY ADEQUATE COMPENSATION TO THE MEMBERS OF THE METROPOLITAN COUNCIL?

AS PRESENTLY CONSTITUTED OR WITH A MULTIPLE VOTING

ARRANGEMENT MY RECOMMENDATION IS THAT METROPOLITAN

COUNCILLORS SHOULD BE MORE ADEQUATELY COMPENSATED

THAN IS PRESENTLY THE CASE. THE COMPENSATION

PRESENTLY PAID IS SUBSTANTIALLY INADEQUATE HAVING

REGARD TO THE TIME AND SERVICES REQUIRED. MY SUG
GESTION IS THAT THE COMPENSATION OF A COUNCILLOR

SHOULD BE INCREASED FROM \$1800 TO \$2400; THAT THE

COMPENSATION TO EACH CHAIRMAN OF A STANDING COMMITTEE SHOULD BE INCREASED FROM \$100 TO \$200 AND

THAT EACH MEMBER OF THE EXECUTIVE COMMITTEE

SHOULD BE PAID IN ADDITION TO THE AMOUNT OF HIS

ANNUAL COMPENSATION AS A COUNCILLOR THE SUM OF

\$1200 PER YEAR. THESE SUGGESTED INCREASES ARE IN MY

VIEW THE MINIMUM AMOUNT WHICH WOULD BE CONSISTENT

WITH THE TIME AND ATTENTION THAT METROPOLITAN

COUNCILLORS ARE REQUIRED TO GIVE TO METROPOLITAN

AFFAIRS.

(3)

SHOULD THE CHAIRMAN OF THE COUNCIL

- (A) BE ELECTED AT LARGE BY THOSE ENTITLED TO VOTE IN THE METROPOLITAN AREA;
- (B) BE ONE OF THE MEMBERS OF THE COUNCIL ELECTED IN A LOCAL MUNICIPALITY; OR
- (C) IS THE PRESENT SYSTEM OF AN ANNUAL ELECTION OF A CHAIRMAN WHO MAY OR MAY NOT BE AN ELECTED MEMBER OF THE COUNCIL SATISFACTORY?

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DISTRICTS AND A SEPARATE METROPOLITAN COUNCIL IS

ADOPTED IT MAY BE SAID WITH SOME MERIT THAT THE

METROPOLITAN CHAIRMAN SHOULD BE ELECTED AT LARGE

AT THE SAME ELECTION. MY VIEW IS CONTRARY TO THAT

SUGGESTION FOR THE REASONS I WILL INDICATE LATER.

OR WITHOUT MULTIPLE VOTING THEN MY VIEW IS THAT IT
WOULD BE TOTALLY IMPRACTICAL TO HOLD AN ELECTION
FOR A METROPOLITAN CHAIRMAN AT LARGE WHEN THERE
WOULD BE NO OTHER PROVISION FOR METROPOLITAN
ELECTIONS.

THIS LEAVES THE OTHER QUESTION TO BE RESOLVED.

SHOULD THE METROPOLITAN CHAIRMAN BE REQUIRED TO

HAVE THE ESSENTIAL QUALIFICATION OF BEING AN ELECTED

MEMBER IN A LOCAL COUNCIL? IN THIS RESPECT IT IS TO

BE REMEMBERED THAT HAVING REGARD TO THE CITY THAT THE

MAYOR AND TWO CONTROLLERS ARE AUTOMATICALLY MEMBERS OF THE METROPOLITAN COUNCIL. IT IS MY VIEW THAT THEY COULD NOT FULFIL THEIR RESPECTIVE DUTIES AS MAYOR OR CONTROLLER OF THE CITY OF TORONTO AND AS METROPOLITAN CHAIRMAN AT THE SAME TIME. IT IS EQUALLY MY VIEW THAT A MAYOR OR REEVE WHO IS HEAD OF ONE OF THE LARGER OR EVEN ONE OF THE SMALLER SUBURBAN MUNICIPALITIES COULD NOT DO JUSTICE TO THE POSITION OF CHAIRMAN OF THE COUNCIL AND TO THE OFFICE OF THE HEAD OF A LOCAL MUNICIPALITY AT THE SAME TIME.

THERE SHOULD BE NO MISTAKE ABOUT THE OBJECTIVITY OF MY VIEWS. I AM UNDER NO DELUSION THAT

ANY PERSON IS INDISPENSABLE TO THE POSITION OF METROPOLITAN CHAIRMAN. THERE ARE MANY CITIZENS OF THIS

AREA WHO ARE WELL QUALIFIED BY EXPERIENCE AND IN

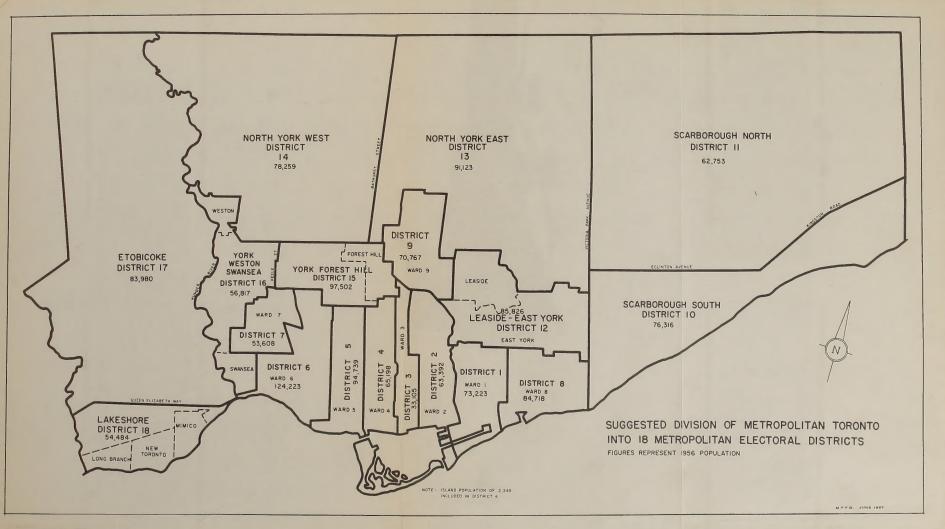
ALL OTHER RESPECTS TO FULLY DISCHARGE THE DUTIES OF

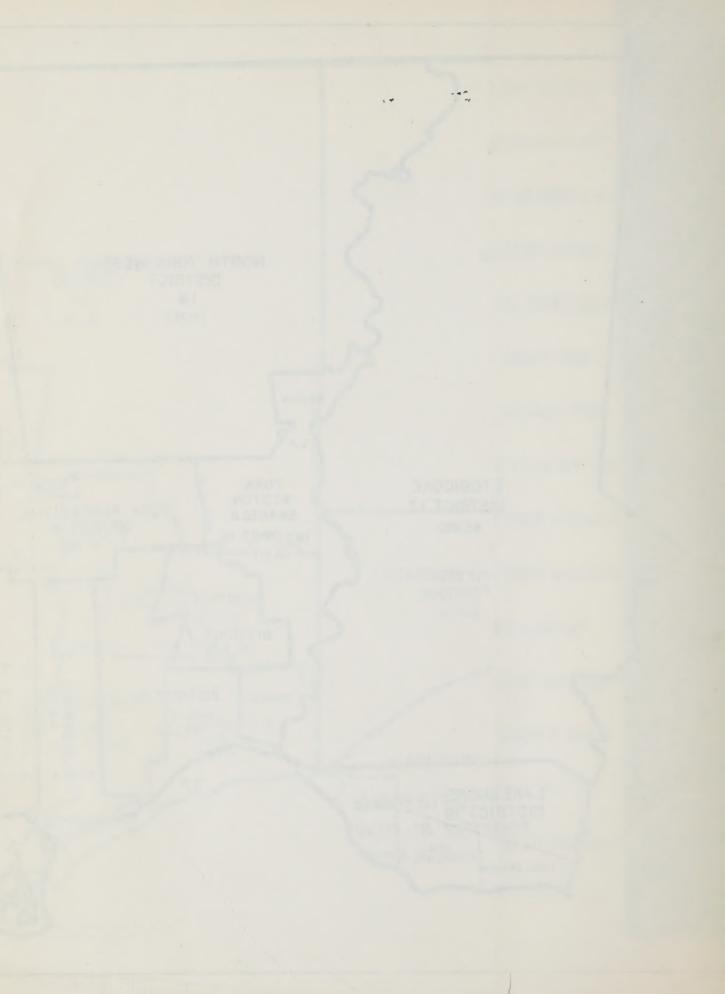
THE CHAIRMAN OF THE METROPOLITAN COUNCIL. HOWEVER I AM VERY DOUBTFUL IF SUCH PERSON WILL BE
FOUND TO BE AVAILABLE IF HE IS REQUIRED TO CONDUCT
AN ELECTION AT LARGE OR TO ATTEMPT TO BE RESPONSIBLE FOR THE EFFICIENT OPERATION OF A LOCAL
MUNICIPALITY AND THE METROPOLITAN CORPORATION
AT THE SAME TIME.

THERE IS ONE OTHER ASPECT OF THE MATTER IN RELATION TO WHETHER A CHAIRMAN OF A METRO-POLITAN COUNCIL SHOULD BE ELECTED. I REALIZE THAT WHAT I AM ABOUT TO SAY MAY BE CONTROVERSIAL AND MAY BE MISINTERPRETED AS BEING INCONSISTENT WITH OUR ACCEPTED PRINCIPLES OF DEMOCRATIC GOVERNMENT. NEVERTHELESS IT IS MY CONVICTION THAT IF THE METROPOLITAN CHAIRMAN HAS TO GAUGE HIS ACTS AND HAVE HIS JUDGMENT UPON IMPORTANT MATTERS AFFECTED BY A CONSIDERATION OF WHETHER A CERTAIN LINE OF ACTION WILL BE CALCULATED TO LOSE OR GAIN VOTES HIS USEFULNESS TO THE METROPOLITAN CORPORATION WILL BE SERIOUSLY DEPRECIATED. TO THOSE WHO SAY SUCH A CONTENTION HOLDS THE SEEDS OF ARBITRARY OR DICTATORIAL ACTION MAY I POINT OUT THAT THE CHAIR-MAN HAS ONLY ONE VOTE IN COUNCIL AND THAT ONE VOTE ONLY WHEN AN EQUALITY OF VOTES IS CAST FOR AND AGAINST ANY MOTION. FURTHERMORE IT IS MY VIEW THAT THE ELECTION OF THE CHAIRMAN BY THE COUNCIL SHOULD BE ON AN ANNUAL BASIS SO THAT IF HIS ACTIONS ARE INCONSISTENT WITH THE MAJORITY OPINION OF THE COUNCIL THE SITUATION MAY BE READILY AND EF-FECTIVELY CORRECTED IN A RELATIVELY SHORT TIME.

FREDERICK G. GARDINER Q.C.

JUNE, 1957.







Archi-

Gardiner, Frederick Goldwin Submission to the Commission

decolato tecture

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